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February 23, 2021

VIA SDNY ECF

The Honorable Paul A. Engelmayer
Thurgood Marshall
United States Court House
40 Foley Square
New York, New York 10007

Re: Julia Khan v. FedEx Ground, et al
Case No.: 1:21-cv-1476
Our File No.: FXGDT-094

Dear Hon. Judge Engelmayer:

Our office represents the Defendant, FedEx Ground Package System, Inc. ("FedEx Ground") in the above-referenced action.

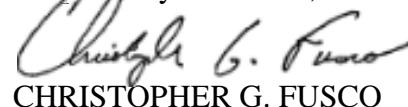
Plaintiff initiated this matter with the filing of a Complaint in the Supreme Court of Bronx County arising out of a motor vehicle accident which occurred on the Pennsylvania Turnpike on January 5, 2020. FedEx Ground filed a Notice of Removal removing this matter to the United States District Court for the Southern District of New York on February 18, 2021.

FedEx Ground's responsive pleading is due on or before February 25, 2021 pursuant to 28 U.S.C. §81(c)(2). FedEx Ground requests an extension of time to respond to Plaintiff's Complaint until March 11, 2021. This is FedEx Ground's first request for an extension of time to respond to Plaintiff's Complaint. Plaintiff has consented to FedEx Ground's request for an extension of time to respond to Plaintiff's Complaint until March 11, 2021. The requested extension does not affect any other scheduled dates in this matter and, as such, a proposed Revised Civil Case Management Plan and Scheduling Order is unnecessary.

Should Your Honor have any questions with respect to the foregoing, please do not hesitate to contact the undersigned.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,



CHRISTOPHER G. FUSCO

CGF/rt
CC: All Parties (via ECF)